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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

BRIGHTHOUSE LIFE INSURANCE  
COMPANY; and BRIGHTHOUSE  
SECURITIES, LLC,

Plaintiffs,

v.

GEORGE SCHMIDT, JR.; LINCOLN  
FINANCIAL ADVISORS CORPORATION;  
and LINCOLN FINANCIAL SECURITIES  
CORPORATION,

Defendants.

Case No. 2:21-cv-01078-JCM-VCF

**STIPULATION AND ORDER  
TO EXTEND DEADLINE FOR  
LINCOLN FINANCIAL ADVISORS  
CORPORATION TO FILE RESPONSIVE  
PLEADING TO COMPLAINT**

**[Second Request]**

Under Local Rules IA 6-1 and 7-1, Defendant Lincoln Financial Advisors Corporation (“LFA”) and Plaintiffs Brighthouse Life Insurance Company and Brighthouse Securities, LLC (collectively “Plaintiffs”), by and through their attorneys, hereby stipulate and request that the Court extend the deadline for LFA to file its responsive pleading to Plaintiffs’ First Amended Complaint (“FAC”) from May 3, 2023, up to and including May 24, 2023.

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1 In support of this Stipulation, the parties state as follows:

2 1. On June 7, 2021, Plaintiffs filed their Complaint asserting claims against LFA, among  
3 others. [ECF No. 1].

4 2. Plaintiffs amended their complaint on November 24, 2021. [ECF No. 15].

5 3. On November 30, 2021, LFA moved to dismiss Plaintiffs' FAC under FRCP 12(b)(1)  
6 and 12(b)(6). [ECF No. 20].

7 4. Plaintiffs filed their Opposition to LFA's Motion to Dismiss Plaintiffs' FAC on  
8 February 4, 2022. [ECF No. 31].

9 5. On February 25, 2022, LFA filed its reply in support of its Motion to Dismiss  
10 Plaintiffs' FAC. [ECF No. 37].

11 6. On March 31, 2023, this Court entered an order granting in part, and denying in part,  
12 LFA's Motion to Dismiss Plaintiffs' FAC ("Order"). [ECF No. 52].

13 7. The Court's March 31, 2023 Order triggered LFA's 14-day deadline to file its  
14 responsive pleading to Plaintiffs' FAC.

15 8. On April 17, 2023, the Court granted the parties' Stipulation to Extend the Deadline for  
16 LFA to File Responsive Pleading to Plaintiffs' FAC. [ECF No. 54].

17 9. LFA's counsel has been investigating and been preparing an appropriate response to  
18 Plaintiffs' remaining claims. Despite best efforts, LFA's counsel needs additional time to complete  
19 LFA's counsel's investigation and prepare a response to Plaintiffs' remaining claims.

20 10. This is LFA's second request to this Court for an extension of time to respond to  
21 Plaintiffs' FAC, the request is in good faith and not for the purposes of delay, and the requested  
22 extension will not prejudice any party.

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11. The parties stipulate and request that the Court extend the deadline for LFA to file its responsive pleading to Plaintiffs' First Amended Complaint from May 3, 2023, up to and including May 24, 2023.

DATED this 3rd day of May, 2023.

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By: /s/ Aimee L. Creed

By: /s/ Tara U. Teegarden

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IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: 5-4-2023

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